

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO, AND THE PUERTO RICO PUBLIC
BUILDINGS AUTHORITY,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

CONSENSUAL MOTION FOR EXTENSION OF TIME TO FILE REPLY

TO THE HONORABLE DISTRICT COURT:

COME NOW, Ivelisse Calderón-Alibrán and Carlos Torres Viada (collectively, “Moving Parties”) as parties in interest, by and through the undersigned counsel, and respectfully state as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. On June 13, 2022, the Moving Parties submitted their *Urgent Motion for Extension of Administrative Expense Claim Bar Date and Proper Service of Process and Request to be Heard*. **[Docket No. 21217]** (“Urgent Motion”).
2. On June 23, 2022, Debtors filed an *Urgent Consensual Motion for Extension of Deadlines* (“Consensual Motion”). **[Docket Entry 21332]** On June 24, 2022, this Honorable Court granted the *Consensual Motion*, moving the deadlines for the Debtors’ responses to July 11, 2022, and the Moving Parties’ replies to July 18, 2022. **[Docket Entry 21340]**
3. Subsequently, the deadline was extended again multiple times at the request of the Oversight Board with the Moving Parties’ consent. Finally, on September 9th, 2022, the Debtors filed their *Response of The Financial Oversight and Management Board to Urgent Motion for Extension of Administrative Expense Claim Bar Date and Proper Service of Process Request to be Heard* (“Response”). **[Docket Entry 22130]** Pursuant to the latest briefing schedule, the Moving Parties’ reply is due this Friday, September 23, 2022.
4. As the Court is aware, Puerto Rico is currently in a state of emergency, after the passing of Hurricane Fiona. Most of the island is still without basic essential services, including electricity and running water. Communications are also down in many areas.
5. In view of the situation, with the consent of counsel for the Oversight Board, the Moving Parties hereby respectfully request an additional seven (7) days to file their reply, until next Friday, September 30, 2022.

WHEREFORE, the Moving Parties respectfully request that this Honorable Court grants this Motion and allow extension of time of seven (7) days, expiring on September 30, 2022, to file the corresponding reply.

RESPECTFULLY SUBMITTED.

In Ponce, Puerto Rico, this 21st day of September 2022.

WE HEREBY CERTIFY that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and attorneys of record.

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/s/ Zoé C. Negrón-Comas
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